IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| UNITED STATES OF AMERICA |) | |
|------------------------------------|---|----------------------------|
| -1 1 100 |) | |
| Plaintiff, |) | |
| |) | |
| |) | |
| vs. |) | Civil Action No. 04 - 192E |
| |) | |
| REAL PROPERTY KNOWN AND |) | |
| NUMBERED AS 12171 BLAIR STREET, |) | |
| CONNEAUT LAKE, PENNSYLVANIA |) | |
| 16316, including all improvements, |) | |
| fixtures, and appurtenances |) | |
| thereto or therein, |) | |
| |) | |
| Defendant |) | |
| | | |

JOINT MOTION TO ESTABLISH DISCOVERY PERIOD

AND NOW come the United States of America, Khang Nguyen and Tu L. Nguyen by and through their respective counsel, and respectively represent as follows:

- 1. The parties will have until October 31, 2006, within which to conduct discovery and settlement negotiations. The hearing scheduled for October 2, 2006 at 9:00 A.M. is continued until further order of court.
- 2. Upon expiration of the discovery period, the parties shall report to the court on the status of their discovery and settlement negotiations, at which time a hearing will be rescheduled if necessary.

3. This Stipulation is subject to the approval of the Court.

WHEREFORE, the United States of America, Khang Nguyen and Tu L. Nguyen respectfully request that this Honorable Court order that the parties have until October 31, 2006, within which to conduct discovery.

Mary Beth Buchanan United States Attorney

By:

Assistant U.S. Attorney Suite 4000, U.S. Courthouse 700 Grant Street Pittsburgh, PA 15219 (412) 894-7370 PA ID #31929 Attorney for Khang Nguyen and Tu L. Nguyen